

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BECTON, DICKINSON AND COMPANY,
GENEOHM SCIENCES CANADA, INC.
and HANDYLAB, INC.,

Plaintiffs,

C.A. No. 19-cv-1126-LPS

v.

NEUMODX MOLECULAR, INC.,
QIAGEN GMBH, and QIAGEN NORTH
AMERICAN HOLDINGS, INC.,

Defendants.

**DECLARATION OF PETER KOHLHEPP IN SUPPORT OF NEUMODX
MOLECULAR, INC., QIAGEN GMBH, AND QIAGEN NORTH AMERICAN
HOLDINGS, INC.’S MOTION TO SEVER PURSUANT TO FED. R. CIV. P. 21 AND
TRANSFER PURSUANT TO 28 U.S.C. § 1404(A)**

I, Peter Kohlhepp, declare as follows:

1. I am an attorney at Carlson, Caspers, Vandenburg, and Lindquist PA in Minneapolis, Minnesota. I am one of the lawyers representing Defendants NeuMoDx Molecular, Inc., Qiagen GMBH, and Qiagen North American Holdings, Inc. (“Defendants”) in connection with the above action. This declaration is made on my personal knowledge and belief, and I could and would testify competently as the contents if called as a witness.

2. I have attached to this declaration a true and correct copy of the following documents:

- **Exhibit 1:** December 9, 2020 email from Plaintiffs’ attorney Mr. David Yin identifying Plaintiffs’ asserted claims;

- **Exhibit 2:** Exhibit 14 to Plaintiffs' Infringement Contentions, served on August 17, 2020 [UNDER SEAL];
- **Exhibit 3:** Report regarding United States District Courts—National Judicial Caseload Profile, available at https://www.uscourts.gov/sites/default/files/data_tables/fcms_na_distprofile0930.2020.pdf
- **Exhibit 4:** Explanation of Selected Terms, available at https://www.uscourts.gov/sites/default/files/explanation_of_selected_terms_september_2020_0.pdf

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Executed on May 13, 2021, in Minneapolis, Minnesota.

/s/ Peter Kohlhepp
Peter Kohlhepp